

Sent via e-mail to: 1605bguidelines.comments@hq.doe.gov

23 June 2005

Mark Friedrichs
PI-40
Office of Policy and International Affairs
U.S. Department of Energy
1000 Independence Ave., SW.
Washington, DC 20585

Subject: Comments on Guidelines for Voluntary Greenhouse Gas Reporting,
Section 1605(b) of the Energy Policy Act of 1992 (70 Federal Register,
Pages 15169-15192, March 24, 2005)

Dear Mr. Friedrichs:

The PowerTree Carbon Company, LLC and the UtiliTree Carbon Company herein submit joint comments on the draft guidelines for voluntary greenhouse gas reporting under Section 1605(b) of the Energy Policy Act of 1992.

The electric power industry owns a large amount of land in order to house and surround its current and future generation, transmission and distribution facilities. Because of this, the industry has a long history of involvement with traditional forest management and tree-planting programs, through preserving forest lands for both recreational use and wildlife habitat, tree maintenance around power lines, education of homeowners on tree placement around power lines, and commercial forestry on electric company-owned lands. In association with events such as Earth Day and Arbor Day, many companies supply seedlings for employees, children and others to plant.

Many companies also have initiated forestry projects specifically to conserve energy and to offset carbon dioxide (CO₂) emissions. Since the Energy Policy Act of 1992 established the "Section 1605(b)" voluntary data base system, electric power companies have reported a large number of forestry projects to address CO₂.

In addition, several collaborative programs among different companies in the industry have been initiated. In 2003, 25 companies established the **PowerTree Carbon Company, LLC**, a voluntary consortium of 25 leading U.S. electric power companies that have committed \$3 million to establish at least five bottomland hardwood reforestation projects in the Lower Mississippi Alluvial Valley (LMAV) - see next section. In 1995, the non-profit **UtiliTree Carbon Company** was established by 41 utilities to sponsor a collection of projects that

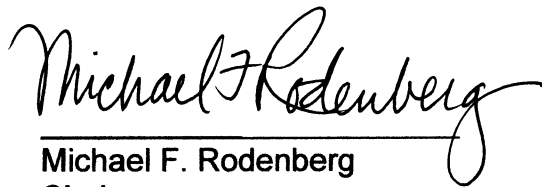
manage greenhouse gases, especially CO₂. The projects consist of a diverse mix of rural tree planting, forest preservation, forest management and research efforts at both domestic (Louisiana, Mississippi, Arkansas and Oregon) and international (Belize and Malaysia) sites. The UtiliTree Carbon Company has committed slightly over \$3 million to fund these projects.

The 1605(b) guidelines are of crucial importance to the industry and to these coalitions.

Attached are three documents that summarize the comments of PowerTree Carbon Company and UtiliTree Carbon Company. We appreciate the opportunity to comment.

If you have any comments or questions, please contact Michael Rodenberg at 313/235-8618 or John Kinsman at 202/508-5711.

Sincerely yours,



Michael F. Rodenberg
Chairman,
Board of Managers
PowerTree Carbon Company



G. Gary Kaster
Chairman,
UtiliTree Carbon Company

Attachments (3)